

LEO M. BRAUSCH
ENVIRONMENTAL MANAGEMENT CONSULTANT

(b) (6)
Gibsonia, PA 15044-9795
Office: (724) 444-0377
Cell: (b) (6)
Fax: (724) 444-0351
Email: lbrausch@fyi.net

961289



April 10, 2010

Mr. James J. Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

**Re: Monthly Progress Report for March 2010, North Bronson Industrial Area Site
Operable Unit 1, Bronson, Michigan**

Dear Mr. Hahnenberg:

The North Bronson Potentially Responsible Parties Group (the Group) submits this monthly progress report to the U.S. Environmental Protection Agency (USEPA), Region 5, pursuant to Article X, Paragraph 31, of the Consent Decree for Remedial Design and Remedial Action (RD/RA) of Operable Unit 1 at the North Bronson Industrial Area (NBIA) Site (the Consent Decree). This report summarizes efforts by the Group to fulfill the requirements of the Consent Decree during March 2010.

1. Activities Completed During This Reporting Period

- A. On March 10, 2010, the Group submitted the February 2010 monthly progress report to USEPA with copies to the Michigan Department of Natural Resources & Environment (MDNRE).
- B. During the week of March 29, 2010, O'Brien & Gere, Inc. personnel conducted the sediment and soil sampling associated with County Drain #30 pursuant to the approved *County Drain #30 Sediment and Soil Sampling Work Plan*.
- C. On March 29 and 31, 2010, Group representatives met with USEPA and MDNRE via conference call to discuss the scope of work to complete the Western Lagoon Area Groundwater Delineation Study.

- D. In cooperation with the City, the Group revised the proposed City Groundwater Ordinance pursuant to review comments received from MDNRE.

2. Results of Sampling and Tests and Other Data

- A. The Group developed no sampling or test data during the reporting period.

3. Work Plans, Procedures, and Deliverables

- A. The Group submitted no work plans, procedures, or deliverables during the reporting period.

4. Actions Projected for Next Six-Week Period

- A. In response to the conference call discussions of March 29 and 31, 2010, the Group plans to submit a revised scope of work for completing the Western Lagoon Area Groundwater Delineation Study. The Group will initiate the needed field work upon USEPA approval of the Group's submittal, as described in Item 5.A below.
- B. TestAmerica Laboratories, Inc. will conduct the analysis of sediment and soil sampling associated with County Drain #30.
- C. The Group plans to make initial contacts with landowners to discuss environmental restrictive covenants for potentially affected properties in Bronson Township.
- D. In cooperation with the City, the Group's contractors plan to install the water line connections for residents within the Restricted and Buffer Zones with private wells and close those private wells.
- E. Pursuant to the provision of Paragraph 29 of the Consent Decree, the Group will submit the revised City Groundwater Ordinance to USEPA following completion of the City water connections and private well closures.

5. Progress and Schedule Report

- A. Near-term milestones for on-going Group activities are as follows:

County Drain #30 Sediment and Soil Sampling

- Per the projected schedule for this activity as provided in the approved work plan, the estimated timeframe for this activity, including laboratory analysis, data validation, and reporting, is seven to eight weeks after mobilization. This schedule provides for reporting to USEPA by the end of May 2010.

Western Lagoon Area Groundwater Delineation Study

- Upon USEPA approval, the Group will complete the Western Lagoon Area Groundwater Delineation Study, including installation of additional wells and a second round of groundwater sampling. The estimated timeframe for this activity, including laboratory analysis, data validation, and reporting, is eight weeks after mobilization. The field work would be most efficiently completed prior to the start of the growing season for local agricultural crops.

Private Well Connections

- The Group plans to conduct the installation of water line connections for residents within the Restricted and Buffer Zones with private wells and closure of those private wells in April 2010.

City Groundwater Ordinance

- The Group plans to submit the City groundwater restriction ordinance to USEPA in May 2010.
- B. As discussed in our project review meeting of March 17, 2009 and subsequently, progress related to RD/RA for enhanced source control at the Eastern and Western Lagoon Areas and County Drain #30 remediation requires resolution of appropriate cleanup standards for non-erodible soils associated with County Drain #30 and groundwater-to-surface water interface criteria.
- C. There are currently no other unresolved issues that affect the performance or timing of pre-design or RD activities.

6. Summary of Proposed or Approved Changes to the Work Plans or Schedules

- A. The work plans for the County Drain #30 sediment and soil sampling and the Western Lagoon Area Groundwater Delineation Study include addenda to the Pre-Design Studies Field Sampling and Quality Assurance Plan. These addenda provide for additional sampling and analytical protocols associated

with those efforts. These work plans also include addenda to the site Health and Safety Plan as needed to address task-specific health and safety issues.

- B. The near-term milestones associated with the most-recent working schedule update are those identified in Item 5.A above.

7. Activities Undertaken in Support of the Community Relations Plan

- A. The Group did not undertake any activities during this reporting period in support of the Community Relations Plan.

* * * *

We trust that this submittal satisfies your requirements at this time. If you have questions regarding this monthly progress report or related project matters, please do not hesitate to contact me.

Respectfully submitted,



Leo M. Brausch
Project Coordinator

LMB:

cc: Deborah D. Larsen, MDNRE
Charles W. Graff, MDNRE

cc (via email):
NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee